

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Suzanne Maier

Debtor

Chapter: **13**

Case No. **15-10053-elf**

**OBJECTION OF PNC BANK, NATIONAL ASSOCIATION
TO DEBTOR'S CHAPTER 13 PLAN**

AND NOW COMES, PNC Bank, National Association ("Mortgagee"), secured creditor and mortgage lien holder on premises owned by Debtor and located at 11704 Corry Road Philadelphia, PA 19154, by its attorneys, Udren Law Offices, P.C., who hereby avers as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on Debtor's real property as set forth above.

2. Debtor filed the instant Chapter 13 Bankruptcy Petition on January 5, 2015.

3. Mortgagee will file a Proof of Claim on or before the bar date of June 7, 2015.

4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had estimated mortgage arrears of \$45,136.82, a total debt to claim in the amount of \$195,923.58 and an ongoing post-petition payment, owed to Mortgagee, in the amount of \$1556.24.

5. Debtor's proposed Chapter 13 Plan provides for payment of mortgage arrears of only \$32,000.00 and lists neither the total debt claim nor the contractual payment owed to Mortgagee.

6. Debtor's proposed Chapter 13 Plan does not provide for the Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. 1325(a)(5)(B)(ii).

WHEREFORE, PNC Bank, National Association prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan.

By: /s/ Nicole LaBletta, Esquire

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